

February 13, 2002

Mr. Tony Euler  
Rauch Inc.  
845 Park Place,  
New Albany, IN 47150-2294

CERTIFIED MAIL

VIA CERTIFIED MAIL

Re: 043-15016-00021  
Re: Revocation of T043-7097-00021

Dear Mr. Euler:

On November 1, 2001, Rauch Inc filed an application (043-15016-00021) with the Office of Air Quality (OAQ) requesting the source be allowed to operate under a Permit By Rule status instead of the Title V status.

Rauch Inc was operating as a Part 70 permitted source under T043-7097-00021 issued October 7, 1998. On November 1, 2001, Rauch Inc informed the OAQ that for the past two (2) years they have been utilizing water based coatings and that the Title V Permit was no longer needed.

As a result, the Title V Operating Permit, T043-7097-00021, issued on October 7, 1998 is hereby revoked. Pursuant to IC 4-21.5-3-3(a) and (b) this revocation letter is effective eighteen (18) days from the date of this letter.

Any change or modification which will alter operations in such a way that the source will no longer comply with 326 IAC 2-10 (Permit by Rule), must obtain the appropriate approval from the OAQ under 326 IAC 2-1.1, 326 IAC 2-2, 326 IAC 2-3, 326 IAC 2-7, 326 IAC 2-8, or 326 IAC 2-9 before such change may occur. This source may at any time apply for a state operating permit under 326 IAC 2-6.1, a Part 70 permit under 326 IAC 2-7, a FESOP under 326 IAC 2-8, or an operating agreement under 326 IAC 2-9, as applicable. [326 IAC 2-10-1(b)]

Sincerely,

Paul Dubenetzky, Chief  
Permit Branch  
Office of Air Quality

AB/EVP  
cc: File - Floyd County

Air Compliance Section Inspector - Warren Greiling  
Technical Support and Modeling – Michele Boner

Mr. Tony Euler  
Rauch, Inc  
845 Park Place,  
New Albany, Indiana 47150-2294

Re: Permit By Rule Status  
043-15016-00021

Dear Mr. Euler:

The letter from Rauch, Inc was received on November 1, 2001 and requested the source be allowed to operate under the Permit By Rule status instead of the Title V status. Rauch, Inc was issued Part 70 T043-7097-00021, dated October 7, 1998. Rauch Inc has indicated that the metal surface coating facility, located at 845 Park Place, New Albany, Indiana 47150-2294 satisfies the criteria to operate under the Permit by Rule provisions.

Pursuant to 326 IAC 2-10 (Permit by Rule), this source shall comply with the following conditions:

- (a) The source's total actual emissions for every 12-month period shall be limited to less than 20% of any threshold for the following:
  - (1) A major source of regulated air pollutants.
  - (2) A major source of hazardous air pollutants, as defined in Section 112 of the Clean Air Act. [326 IAC 2-10-3(1)]
- (b) The source shall not rely on air pollution control equipment to comply with the above-mentioned limitations. [326 IAC 2-10-3(2)]
- (c) Not later than thirty (30) days after receipt of written request by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ), or U.S. Environmental Protection Agency (EPA), the owner or operator shall demonstrate that the source is in compliance with the above-mentioned conditions. [326 IAC 2-10-4]
- (d) Compliance demonstration shall be based on actual emissions for the previous 12 months and may include, but is not limited to, fuel or material usage or production records. No other demonstration of compliance shall be required. [326 IAC 2-10-4]

- (e) The source is located in Floyd County and has the potential to emit VOC into the ambient air at levels equal to or greater than 10 tons per year, therefore it is subject to emissions reporting (326 IAC 2-6). Pursuant to this rule:
- (1) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by April 15 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements and be used for the purpose of a Part 70 fee assessment:
- (A) Indicate estimated actual emissions of criteria pollutants from the source;
- (B) Indicate estimated actual emissions of other regulated pollutants (as defined by 326 IAC 2-7-1) from the source, for purposes of Part 70 fee assessment.
- (2) The annual emission statement covers the twelve (12) consecutive month time period starting December 1 and ending November 30. The annual emission statement must be submitted to:
- Indiana Department of Environmental Management  
Technical Support and Modeling Section, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015
- The emission statement does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (3) The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (f) This source has actual VOC emissions of greater than 15 pound per day, therefore, 326 IAC 8-2 applies. Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of coating delivered to the applicator at the spray booth shall be limited to 3.5 pounds of VOCs per gallon of coating less water, for air dried coatings.

Solvent sprayed from application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

Based on the MSDS submitted by the source and calculations made, the spray booth is in compliance with this requirement.

This source is hereby notified that this Permit by Rule approval does not relieve the source of the responsibility to comply with the provisions of any applicable federal, state, or local requirements, such as New source Performance Standards (NSPS), 40 CFR Part 60, or National Standards for Hazardous Air Pollutants (NESHAP), 40 CFR Part 61. [326 IAC 2-10-5]

This Permit by Rule supersedes the Part 70 T043-7097-00021, issued October 7, 1998 and the Title V Administrative Amendment AAT043-10596, issued March 1, 1999.

Any change or modification which will alter operations in such a way that the source will no longer comply with 326 IAC 2-10 (Permit by Rule), must obtain the appropriate approval from the OAQ under 326 IAC 2-1.1, 326 IAC 2-2, 326 IAC 2-3, 326 IAC 2-7, 326 IAC 2-8, or 326 IAC 2-9 before such change may occur. This source may at any time apply for a state operating permit under 326 IAC 2-6.1, a Part 70 permit under 326 IAC 2-7, a FESOP under 326 IAC 2-8, or an operating agreement under 326 IAC 2-9, as applicable. [326 IAC 2-10-1(b)]

Any violation of 326 IAC 2-10 (Permit by Rule) may result in administrative or judicial enforcement proceedings under IC 13-30-3 and penalties under IC 13-30-4.

Sincerely,

Paul Dubenetzky, Chief  
Permit Branch  
Office of Air Quality

AB/EVP

cc: File - Floyd County  
Air Compliance Section Inspector - Warren Greiling  
Technical Support and Modeling – Michele Boner